

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

RICHARD GRENELL )  
 )  
 Plaintiff, )  
 v. ) CASE NO.:  
 )  
 OLIVIA TROYE )  
 )  
 Defendant. )

**DEFENDANT'S NOTICE OF REMOVAL**

Defendant, Olivia Troye, by counsel, for her Notice of Removal pursuant to 28 USC §1332, §1441, and §1446, states the following:

1. Plaintiff filed a Complaint in the Circuit Court for the City of Alexandria styled as *Richard Grenell v. Olivia Troye*. A copy of Plaintiff's Complaint is attached hereto as Exhibit A.
2. Plaintiff has not served Defendant, but counsel became aware of the Complaint by observing the Alexandria Circuit Court docket.

**Grounds for Removal**

3. The removal of this action is timely and proper pursuant to 28 USC §1332, §1441, and §1446.

4. Defendant's Notice of Removal has been timely filed within thirty (30) days of receipt of Plaintiff's Complaint, and Defendant has not been served. *See, e.g., Gibbons v. Bristol-Myers Squibb Co.*, 919 F.3d 699, 705 (2d Cir. 2019); *Spigner v. Apple Hospitality REIT, Inc.*, No. 3:21-cv-00758, (E.D. Va. Mar. 1, 2022).

5. Defendant is simultaneously filing a Notice of Removal to Federal Court with the Circuit Court for the City of Alexandria, attached hereto as Exhibit B.

6. Upon information and belief, at all times relevant hereto, the Plaintiff, Richard Grenell, was a resident of California.

7. At all times relevant hereto, Defendant Olivia Troye, was a resident of Virginia.

8. The parties are citizens of different states and therefore there is perfect diversity of citizenship as contemplated by 28 USC §1332.

9. The Court has jurisdiction over this matter based on diversity of citizenship pursuant to the terms of 28 USC §1332(a)(c)(1).

10. Plaintiff's complaint seeks judgment against the Defendant in the amount of \$6,000,000.

11. Therefore, the amount in controversy exceeds the jurisdictional requirement of \$75,000.00 as contemplated by 28 USC §1332(a) for removal actions based on diversity.

12. Therefore, this suit should be removed to this Court pursuant to the provisions of 28 USC §1441.

13. The venue of the Eastern District of Virginia, Alexandria Division, is appropriate for purposes of removal pursuant to Rule 3 of the Local Rules of the United States District Court for the Eastern District of Virginia because the Eastern District of Virginia, Alexandria Division, embraces the City of Alexandria, where Plaintiff's State Court Complaint was filed.

14. Contemporaneous with the filing of this Notice, Defendant has provided to the adverse party, by counsel, written notice of this Notice of Removal.

Dated: April 19, 2024

Respectfully Submitted,

/s/ Thomas M. Craig

Thomas M. Craig, (VSB #58063)

Grace H. Williams (VSB # 88103)

**Fluet**

1751 Pinnacle Drive, Suite 1000

Tysons, Virginia 22102

T: (703) 590-1234 | F: (703) 590-0366 fax

tcaraig@fluet.law

gwilliams@fluet.law

Mark S. Zaid (*pro hac vice* forthcoming)

**Mark S. Zaid, P.C.**

1250 Connecticut Avenue, N.W.

Suite 700

Washington, D.C. 20036

T: (202) 498-0011

F: (202) 330-5610

Mark@MarkZaid.com

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2024, a true and correct copy of the foregoing Notice of Removal was served via email, facsimile, and U.S. Mail to the following attorneys of record:

Jesse Binnall, Esq.

Jason Greaves, Esq.

BINNALL LAW GROUP, PLLC

717 King Street, Suite 200

Alexandria, VA 22314

F: 703-888-1930

jesse@binnall.com

jason@binnall.com

/s/ Thomas M. Craig

Thomas M. Craig, Esq.